

January 28, 2025

Judge Claudia Wilken

United States District Court

Northern District of California

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Re: In re College Athlete NIL Litigation, Case No. 4:20-cv-03919-CW (N.D. Cal.)

Dear Judge Wilken,

My name is Dorsey Gibson, and I also go by the first name Will, which is how I was listed on the Stanford Football Roster. I am currently a Senior at Stanford University. I played on the Stanford football team for two seasons, 2021 and 2022. I am submitting this objection to the “Settlement Football and Men’s Basketball Class” definition in the proposed settlement of the above-referenced litigation, which limits membership only to full Grant-in-Aid (“GIA”) scholarship athletes.

During my football career at Stanford, Stanford was a member of the PAC-12. Thus, I played in a Power Five conference my entire career at Stanford.

I was offered and accepted a Preferred Walk-On (“PWO”) position at Stanford. As a recruited PWO, I did not have to try out for the team. I was treated the same as any GIA player, except that I did not receive the same financial benefits as a GIA player. I was a full member of the team, subject to the same regulations and expectations as GIA players. I was held to the same athletic and academic standards as all GIA players, including full 12 months-a-year participation in all football practices, lifts, trainings, meetings, and activities.

During both of my two seasons, I was an active roster participant in Fall Camp, a time of year when the roster number is limited per NCAA Bylaw 17.11.3.1.2. I played in two games during my two seasons on the team (verified by the PFF website). All of these snaps occurred during my sophomore year in Stanford’s games versus Colgate and UCLA. I traveled to one away game during my freshman season and was on the travel roster for every game during my sophomore season. I was named to the Pac-12 Academic Honor Roll once.

As a full member of the Stanford football team, I propose that players in my position should be added to the definition of the “Settlement Football and Men’s Basketball Class.” My NIL was used on broadcast television and other media. During my time at Stanford, I was not getting a free education like GIA players, but my NIL was used along with GIA players to promote the football team during broadcasts in the two seasons in which I competed. I believe it is only fair and reasonable that players like myself be eligible for broadcast NIL payments and not be treated

differently than GIA players, particularly when some of them may have played less on the field than I did.

It is not fair that athletic scholarship status alone determines that one player's NIL on the field is worth significant broadcast compensation, whereas the teammate alongside him in the same game is worth nothing. I request that the definition of the "Settlement Football and Men's Basketball Class" include all Power 5 athletes who actively participated and contributed to their teams. An easily verifiable measure, such as participation on a roster during Fall Camp or games played/snap count, would fairly include all athletes who contributed to the broadcast revenue.

Respectfully submitted,

Dorsey Gibson

NCAA Eligibility Center ID: 2101998114